

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS**

IN RE:

CASE NO: 21-31087

MAGELLAN E & P HOLDINGS, INC.
Debtor

CHAPTER 7

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that Martin S. Bohman, Harry E. Morse, and the firm of Bohman | Morse, LLC appear on behalf of Offshore Marine Contractors, Inc. pursuant to Section 1109(b) of Title 11 of the United States Code (“Bankruptcy Code”) and Rule 9010 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”) hereby submit this notice of appearance and request hereby notice of all hearings and conferences herein and make demand for service of all papers herein, including all papers and notices pursuant to Rules 2002, 3017, and 9007 of the Bankruptcy Rules. All notices given or required to be given in these cases should be served as follows:

MARTIN S. BOHMAN
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PLEASE TAKE FURTHER NOTICE, that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules and Section 1109(b) of the Bankruptcy Code, but also includes without limitation the schedules, statements of financial affairs, operating reports, pleadings, motions, applications, complaints, demands, hearings, requests or pleadings, and disclosure statements, as well as any letters, objections, answers or replies, memoranda and

briefs in support of and of the foregoing and any other document submitted to or brought before this Court with respect to these proceedings, whether formal or informal, and regardless of whether said document is conveyed by mail, electronic mail, facsimile or any other means filed or delivered to the Bankruptcy Clerk or Judge in connection with the above referenced bankruptcy cases and any proceeding relating thereto or relating to the property of the Debtors herein.

PLEASE TAKE FURTHER NOTICE that neither this Notice nor any later appearance, pleading, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right to trial by jury in any proceeding related to these cases or any cases, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this notice, (v) an election of remedy, (vi) any other rights, claims, actions, defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

DATED: April 20, 2021

Respectfully submitted:

BOHMAN | MORSE, LLC

/s/Martin S. Bohman

MARTIN S. BOHMAN (LA #22005)

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Attorneys for Offshore Marine Contractors, Inc.

CERTIFICATE OF SERVICE (to CM/ECF)

I hereby certify that on April 20, 2021 a true and correct copy of the foregoing *Notice of Appearance and Request for Service* was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to parties and counsel who are Filing Users by operation of the court's electronic filing system. I also certify that I have mailed by United States Postal Service this filing to any non-CM/ECF participants.

/s/ Martin S. Bohman
MARTIN S. BOHMAN